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15 *Attorneys for Plaintiff*
16 LAURI VALJAKKA

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 **LAURI VALJAKKA,**

21 Plaintiff,

22 v.

23 **NETFLIX, INC.,**

24 Defendant.

Case No. 4:22-CV-01490-JST

**PLAINTIFF'S UNOPPOSED MOTION
TO AMEND CASE SCHEDULE**

Judge: Hon. Jon S. Tigar

Plaintiff Lauri Valjakka (“Valjakka”) respectfully submits this Unopposed Motion to Amend Case Schedule.

On January 10, 2023, the Court entered the Case Schedule.¹ Good case exists to amend the schedule. The parties have been working to conduct fact discovery and schedule fact witness depositions, but additional time is needed to complete the process. The parties anticipate that providing an extension of four additional weeks should be sufficient to complete fact and expert discovery, as indicated in the proposed Amended Case Schedule provided below. The proposed extension therefore would not cause prejudice to either party and is in the interest of justice.

Additionally, although the proposed Amended Case Schedule involves shifting the summary judgment / Daubert briefing (including Opening, Response, and Reply) deadlines by two weeks, the parties’ proposal does not impact the Court’s previously scheduled hearing date on the summary judgment / Daubert motions, the pretrial conference date, or the trial date.

Current Date	Proposed Amended Date	Description
05/12/2022	06/14/2023	Close of fact discovery
05/19/2023	06/16/2023	Deadline to file discovery motions relating to fact discovery
06/02/2023	06/30/2023	Opening expert reports due
07/14/2023	08/11/2023	Rebuttal expert reports due
08/11/2023	09/08/2023	Close of expert discovery
09/08/2023	9/22/2023	Opening summary judgment / Daubert briefs

¹ Doc. No. 77

09/22/2023	10/6/2023	Response summary judgment / Daubert briefs
09/29/2023	10/13/2023	Reply summary judgment / Daubert briefs
10/19/2023 2:00pm PST	10/19/2023 2:00 PST, or TBD by Court 11/2/2023	Hearing on summary judgment/Daubert briefs
1/12/2024, 2:00pm PST	1/12/2024, 2:00pm PST, or TBD by Court	Pretrial Conference
02/05/2024, 8:00am PST	02/05/2024, 8:00am PST, or TBD by Court	Trial

CONCLUSION

For all the foregoing reasons, Plaintiff Lauri Valjakka respectfully asks the Court to grant its Unopposed Motion to enter the Amended Case Schedule, as reflected above.

Dated: May 11, 2023

Respectfully submitted,

RAMEY LLP

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PLAINTIFF'S UNOPPOSED MOTION TO AMEND CASE SCHEDULE - Case No. 4:22-CV-01490-JST

1
2 DATED: May 11, 2023

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27 *Attorneys for Defendant*
28 *NETFLIX, INC.*

CERTIFICATE OF CONFERENCE

20 Pursuant to Local Rules, the counsel for Plaintiff and counsel for Defendant have met and
21 conferred telephonically on May 9, 2023 regarding the matters stated above. Defendant has
22 indicated that it is unopposed.

23 RAMEY LLP

24 By: /s/ Susan S.Q. Kalra
25 Susan S. Q. Kalra SBN 167940
26

27 PLAINTIFF'S UNOPPOSED MOTION TO AMEND CASE SCHEDULE - Case No. 4:22-CV-01490-JST
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PROPOSED ORDER

IT IS HEREBY ORDERED that the above Amended Case Schedule is approved.

IT IS SO ORDERED.

DATED: May 18, 2023



Hon. Jon S. Tigar